

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-1(b)

FROST BROWN TODD LLP

Jordan S. Blask, Esq. (NJ I.D. #JB4173)
501 Grant Street, Suite 800
Pittsburgh, PA 15219
Telephone: (412) 513-4300
Facsimile: (412) 513-4299
Email: jblask@fbtlaw.com

--and--

Ronald E. Gold (Ohio Bar No. 0061351)
3300 Great American Tower
301 East Fourth Street
Cincinnati, OH 45202
Telephone: (513) 651-6800
Facsimile: (513) 651-6981
E-mail rgold@fbtlaw.com

*Counsel to WPG Legacy, LLC and Cintas
Corporation*

In Re:

Bed Bath & Beyond Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Hon. Judge Vincent F. Papalia

(Jointly Administered)

APPLICATION FOR ADMISSION OF RONALD E. GOLD *PRO HAC VICE*

The undersigned hereby seeks an Order granting the admission *pro hac vice* of Ronald E. Gold of the Law Firm of Frost Brown Todd LLP, to practice before this Court in connection with the above-captioned proceeding. This application (the “Application”) is submitted pursuant to rule

¹ The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey. Unless requested by other parties, no oral argument is requested. A proposed form of Order is attached. In support of the Application, the undersigned hereby represents as follows:

1. I am an attorney with Frost Brown Todd LLP (“FBT”), which law firm maintains an office at 501 Grant Street, Suite 800, Pittsburgh, PA 15219. FBT has been retained to serve as counsel for WPG Legacy, LLC and Cintas Corporation in connection with the above-captioned bankruptcy case.

2. I am an attorney-at-law of the State of New Jersey and am admitted to practice before the United States District Courts for New Jersey.

3. I submit this Application, pursuant to Civ. Rule 101.1(c) of the Local Rules of the United States District Court for the District of New Jersey and Rule 9010-1 of the Local Rules of Bankruptcy Practice for the United States Bankruptcy Court for the District of New Jersey, in support of an Order Approving Admission, *Pro Hac Vice*, of Ronald E. Gold, Esq.

4. Mr. Gold is an attorney with the firm of Law Firm of Frost Brown Todd LLP, which maintains an address of 301 East Fourth Street, Suite 3300, Cincinnati, Ohio 45202.

5. Attached hereto as Exhibit A is a certification of Mr. Gold in which he certifies that he is, and has been, a member in good standing of the bar of Ohio since 1993, and is admitted to practice in the United States Court of Appeals for the Sixth (since 1995) and Seventh (since 2004) Circuits, as well as the United States District Courts for the Northern District of Illinois (since 1989), Southern District of Illinois (since 2019), Northern District of Indiana (since 2004), Southern District of Indiana (since 2002), Northern District of Ohio (since 2004), Southern District of Ohio (since 2004), Eastern District of Wisconsin (since 1990), District of Colorado (since 2010), Eastern District of Michigan (since 2019), and Southern District of Texas (since 2022).

Additionally, Mr. Gold certifies that he is, and has remained, a member in good standing of said bar at all times, that no disciplinary proceedings are pending against him in any jurisdiction and no discipline has previously been imposed on him in any jurisdiction.

6. Mr. Gold is familiar with the circumstances surrounding the above-captioned proceeding and applicable law, and his presence will serve the best interests of WPG Legacy, LLC and Cintas Corporation.

7. Mr. Gold is familiar with the Local Rules of practice of this Court.

WHEREFORE, the undersigned respectfully requests entry of the Order submitted herewith approving the admission, *pro hac vice*, of Ronald E. Gold, Esq. to represent WPG Legacy, LLC and Cintas Corporation as counsel in connection with the above-captioned proceeding.

Dated: April 25, 2023

FROST BROWN TODD LLP

/s/ Jordan S. Blask
(NJ I.D. #JB4173)
501 Grant Street, Suite 800
Pittsburgh, PA 15219
Telephone: (412) 513-4300
Facsimile: (412) 513-4299
Email: jblask@fbtlaw.com

Counsel to WPG Legacy, LLC and Cintas Corporation

Exhibit A

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

FROST BROWN TODD LLP

Jordan S. Blask, Esq. (NJ I.D. #JB4173)
501 Grant Street
Suite 800
Pittsburgh, PA 15219
Telephone: (412) 513-4300
Facsimile: (412) 513-4299
Email: jblask@fbtlaw.com
--and--

Ronald E. Gold (Ohio Bar No. 0061351)
3300 Great American Tower
301 East Fourth Street
Cincinnati, OH 45202
Telephone: (513) 651-6800
Facsimile: (513) 651-6981
E-mail rgold@fbtlaw.com

Counsel to WPG Legacy, LLC and Cintas Corporation

In Re:

Bed Bath & Beyond Inc., *et al.*,²

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Hon. Judge Vincent F. Papalia

(Jointly Administered)

**CERTIFICATION OF RONALD E. GOLD IN
SUPPORT OF APPLICATION FOR ADMISSION PRO HAC VICE**

Ronald E. Gold certifies, pursuant to 28 U.S.C. §1746, as follows:

1. I am a partner with the law firm Frost Brown Todd LLP, which maintains an address of 301 East Fourth Street, Suite 3300, Cincinnati, Ohio 45202.

2. I make this certification in support of my application (the “Application”) pursuant

² The last four digits of Debtor Bed Bath & Beyond Inc.’s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor’s tax identification number may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

to rule 9010-1 of the Local Rules of the United States Bankruptcy Court for the District of New Jersey (the “Local Rules”), for admission to the Bankruptcy Court *pro hac vice*. Frost Brown Todd LLP has been retained to serve as counsel to WPG Legacy, LLC and Cintas Corporation in connection with the above-captioned proceedings.

3. I am and have been, a member in good standing of the bar of Ohio since 1993, and am admitted to practice in the United States Court of Appeals for the Sixth (since 1995) and Seventh (since 2004) Circuits, as well as the United States District Courts for the Northern District of Illinois (since 1989), Southern District of Illinois (since 2019), Northern District of Indiana (since 2004), Southern District of Indiana (since 2002), Northern District of Ohio (since 2004), Southern District of Ohio (since 2004), Eastern District of Wisconsin (since 1990), District of Colorado (since 2010), Eastern District of Michigan (since 2019), and Southern District of Texas (since 2022).

4. I am, and have remained, a member in good standing of said bar at all times. No disciplinary proceedings are pending against me in any jurisdiction and no discipline has previously been imposed on me in any jurisdiction.

5. I am familiar with the circumstances surrounding the above-captioned bankruptcy cases and applicable law, and my presence will serve the best interests of WPG Legacy, LLC and Cintas Corporation.

6. I am not admitted to practice law in the State of New Jersey and therefore believe it is necessary for me to seek *pro hac vice* admission in this proceeding.

7. I have never been denied admission or disciplined in accordance with the Local Rules, nor have I been denied admission to any other Court.

8. I am in possession of and have reviewed a copy of the Local Rules of this Court.

9. If admitted *pro hac vice*, I agree to abide by the Local Bankruptcy Rules, and to make the payments to the Clerk of the United States Court for the District of New Jersey and the New Jersey Lawyer's Fund for Client Protection as provided in Rule 101.1 of the Local Rules of the United States District Court for the District of New Jersey.

I certify under penalty of perjury that the foregoing is true and correct.

Dated: April 25, 2023

/s/ Ronald E. Gold
Ronald E. Gold

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-1(b)

FROST BROWN TODD LLP

Jordan S. Blask, Esq.

(NJ I.D. #JB4173)

501 Grant Street, Suite 800

Pittsburgh, PA 15219

Telephone: (412) 513-4300

Facsimile: (412) 513-4299

Email: jblask@fbtlaw.com

--and--

Ronald E. Gold (Ohio Bar No. 0061351)

3300 Great American Tower

301 East Fourth Street

Cincinnati, OH 45202

Telephone: (513) 651-6800

Facsimile: (513) 651-6981

E-mail rgold@fbtlaw.com

*Counsel to WPG Legacy, LLC and Cintas
Corporation*

In Re:

Bed Bath & Beyond Inc., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-13359 (VFP)

Hon. Judge Vincent F. Papalia

(Jointly Administered)

ORDER FOR ADMISSION PRO HAC VICE

The relief set forth on the following page is **ORDERED**.

¹ The last four digits of Debtor Bed Bath & Beyond Inc.'s tax identification number are 0488. A complete list of the Debtors in these Chapter 11 Cases and each such Debtor's tax identification number may be obtained on the website of the Debtors' proposed claims and noticing agent at <https://restructuring.ra.kroll.com/bbby>. The location of Debtor Bed Bath & Beyond Inc.'s principal place of business and the Debtors' service address in these Chapter 11 Cases is 650 Liberty Avenue, Union, New Jersey 07083.

This matter having been brought before the Court on application for an Order For Admission Pro Hac Vice; and the Court having reviewed the moving papers of the applicant, out-of-state attorney, and considered this matter pursuant to Fed.R.Civ.Proc.78, D.N.J. L.Civ.R.101.1 and D.N.J. LBR 9010-1, and good cause having been shown; it is

ORDERED that Ronald E. Gold be permitted to appear pro hac vice; provided that pursuant to D.N.J. L.Civ. R. 101.1(c)(4), an appearance as counsel of record shall be filed promptly by a member of the bar of this Court upon whom all notices, orders and pleadings may be served, and who shall promptly notify the out-of-state attorney of their receipt. Only an attorney at law of this Court may file papers, enter appearances for parties, sign stipulations, or sign and receive payments on judgments, decrees or orders, and it is further

ORDERED that the applicant shall arrange with the New Jersey Lawyers' Fund for Client Protection for payment of the annual fee, for this year and for any year in which the out-of-state attorney continues to represent a client in a matter pending in this Court in accordance with New Jersey Court Rule 1:28-2 and D.N.J. L. Civ. R. 101.1, said fee to be deposited within twenty (20) days of the date of the entry of this Order, and it is further

ORDERED that the \$150.00 fee required by D.N.J. L. Civ. R. 101(c)(3) for pro hac vice admission to the District Court for the District of New Jersey shall also be payable within twenty (20) days of entry of this Order. Payment in the form of a check must be payable to "Clerk, USDC" and forwarded to the Clerk of the United States District Court for the District of New Jersey at the following address:

United States District Court
District of New Jersey
Martin Luther King, Jr. Federal Building
50 Walnut Street
Newark, N.J. 07102
Attention: Pro Hac Vice Admissions

and it is further ORDERED that the applicant shall be bound by the Local Rules of the United States District Court for the District of New Jersey and the Local Rules of Bankruptcy Procedure for the District of New Jersey; and it is further

ORDERED that the Clerk shall forward a copy of this Order to the Treasurer of New Jersey Lawyers' Fund for Client Protection within 5 days of its date of entry.